

COMCARE

EMERGENCY RESPONSE ALLIANCE

February 28, 2007

HAND DELIVERY

Marilyn R. Abbott
Secretary
U.S. International Trade Commission
500 E Street SW
Washington, DC 20436

Re: *Certain Baseband Processor Chips and Chipsets,
Transmitter and Receiver (Radio) Chips, Power Control
Chips, and Products Containing Same, Including Cellular
Telephone Handsets, Inv. No. 337-TA-543: Request to
Appear at Public Hearing*

Dear Secretary Abbott:

On February 9, 2007, the Commission issued a Notice of Public Hearing in the above-captioned matter, 72 Fed. Reg. 7456 (February 15, 2007). The Notice provides an opportunity for government agencies, public interest groups, and other interested members of the public to make oral presentations on the issues of remedy and public interest. Pursuant to that notice, I hereby submit this request to appear and make an oral presentation on behalf of COMCARE, a national non-profit educational and advocacy group of more than 100 organizational members. A brief synopsis of my oral presentation is attached.

If there are any questions, please contact the undersigned.

Sincerely yours,



David K. Aylward
Director

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U.S. INTERNATIONAL TRADE COMMISSION
SECRETARY
FEB 28 2007

SYNOPSIS OF THE ORAL PRESENTATION OF

COMCARE Emergency Response Alliance

Hearing In The Matter Of Certain Baseband Processor Chips And Chipsets, Transmitter And Receiver (Radio) Chips, Power Control Chips, And Products Containing Same, Including Cellular Telephone Handsets, Inv. No. 337-TA-543

COMCARE Emergency Response Alliance is a non-profit national advocacy organization with over 100 organizational members dedicated to advancing emergency response and communications in the United States. Our goal is to create an environment of seamless information sharing to achieve the most advanced and efficient response to emergencies. We have no commercial ventures.

As we struggle to modernize US emergency communications, we recognize that the old boundaries between public safety and private communications systems are artificial and entirely outdated. Emergency communications are often initiated by the public. And public safety agencies use commercial wireless services. A remedy in this case banning the importation of EV-DO handsets and chipsets would deny responders access to technology used for emergency communications. Reliable high speed communications is a key tool to maintaining public safety and for crisis management, and a ban on importation of EV-DO equipment would take a key communications tool out of the hands of the emergency responders around the country. The safety mission of COMCARE members requires us to share broadband communications between multiple emergency agencies in a mobile environment. Some of our members currently utilize EV-DO equipment to meet these requirements.

While we take no position on the underlying merits of this case, we are very concerned about possible remedies. Forced substitution of EV-DO handsets with other communications equipment would be extremely difficult, expensive, and time consuming for them and would leave them without the communications capabilities they need to save lives and allocate critical services.

Lastly, wireless E-911 deployment has been a priority for COMCARE since our founding 9 years ago. It is our experience that cellular telephones equipped with EV-DO deliver improved E-911 position locations and performance over earlier GPS-based devices. Our efforts suggest that the E-911 position performance available through EV-DO technology is the best and most accurate available in GPS-based cellular technology.